## JUN 0 7 2001

STAN SIMS: Thank you for visiting our community this evening to allow us to present our preliminary comments on the Department's Supplemental impact statement.

My name is Stan Sims, S-i-m-s, and I am Assistant Project Administrator for the Nye County Department of Natural Resources and Federal Facilities.

Nye County staff is still reviewing the -- it's a rolling blackout. Nye County staff is still reviewing the Supplemental DEIS and so today I am providing very brief preliminary remarks associated with that report. The County will try to follow up tonight's oral remarks with formal written comments by the DOE stated deadline, if possible.

That brings about my first remark here. The County's remark is, in fact, a request to extend the comment deadline by at least 45 days to allow County staff and residents adequate time to review, understand and prepare comments on the supplemental DEIS.

Although the Supplement is a brief document, it is not a stand-alone report. Many of you already recognize the fact there's a Science and Engineering Report associated with this. Although the Supplement is a brief document, to understand and assess the environmental impact of the newly proposed flexible design repository, reviewers must also review the companion document, the Science and Engineering Report, which is quite voluminous and complex, as we've already heard.

Nye County believes that given the size and technical nature of these two reports, the 45-day comment period is unreasonable. Stakeholders just can't be expected to review these two technical documents in such a short period of time.

Since the County has not yet completed its review, my remaining remarks will be brief. One of the things we're taking a look at, of course everybody has commented on this tonight at one time or another, is the introduction of a surface aging facility that will increase the complexity of waste handling, increase bare fuel handling activities, increase radioactivity waste generation, and one would expect increased both worker and public risk.

Somehow these additional risks, since the risks are in total, is predicted to decrease in new design. I haven't been able to figure that one out yet. The FEIS needs to explain how this risk is decreased.

3... The second point is although the S&ER discloses that off-normal events could occur at the surface aging facility and Waste Handling Building, the specific types of off-normal events, their probability of occurrence

- 3 cont. or the potential consequences to the workers, the public or the environment is not really identified. I think you have to say that the FEIS needs to identify these possible events and their consequences. It really doesn't do that.
- SDEIS continues to perpetuate the myth that Nye County is static. Growth in Nye County is now well documented by the results of the 2000 census. And plans for development along the US-95 corridor at Amargosa Valley slash Lathrop Wells continue to move forward. The current demographic trend must be recognized and appropriately considered in the FEIS.
- The increased need for energy, this is the last point here, the increased need for energy at the proposed repository is addressed by the introduction of an ad hoc solar generation facility. This is a new thing for us. Nye County notes that such a facility should be integrated into other regional planning efforts.

And that's all the time we're going to spend with this tonight. Thank you very much.